Similar legislation exists in certain other states. It may be so drawn as to deprive only murderers of the privilege of inheritance. See *Estate of Kirby* (1912) 162 Cal. 91, 121 Pac. 370. But the Kansas statute obviously included manslaughter. The defendant's constitutional objection was equally ill-founded. Under the statute there is no forfeiture; the criminal heir never takes title, even though proof of that fact can not be made until after conviction of the crime.

JURY—QUALIFICATIONS OF GRAND JURORS—WOMEN ELIGIBLE.—The petitioner, who had been indicted by a grand jury composed partly of women, sought by a writ of prohibition to establish the invalidity of the indictment. One section of the Nevada constitution prohibited trial for certain crimes "except on presentment or indictment of the grand jury"; another section provided that "Laws shall be made to exclude from serving on juries all persons not qualified electors of this state"; and a third section limited the election franchise to male citizens of a certain age and residence. By a later amendment the word "male" was omitted from this section and a provision was added that there shall be no denial of the elective franchise on account of sex. *Held,* that women, being qualified electors, were eligible to serve on the jury, and that the indictment was valid. Coleman, J., *dissenting. Parus v. District Court* (1918, Nev.) 174 Pac. 706.

At the time of the adoption of the Nevada constitution the term "grand jury" read in the light of the common law, was limited to men. See 3 Blackstone, *Com.* *362; *State v. Hartley* (1895) 22 Nev. 342, 40 Pac. 372. Jurors had also to be qualified electors, under the second constitutional section above quoted. This was a clause of exclusion rather than inclusion, and the mere fact that women were later made electors would not necessarily make them eligible for jury duty. The real issue between the majority and the minority was whether "grand jury" should still be read in the light of the common law or in the light of modern changes which gave women the franchise. The usual canons of construction seem to support the minority. Such was the holding in *People v. Jensen* (1917, Cal. App.) 167 Pac. 406.

MARRIAGE AND DIVORCE—COMMON LAW MARRIAGE—EFFECT OF REMOVAL OF PRE-EXISTING IMPEDIMENT.—In 1902 the petitioner went through a marriage ceremony with the defendant, who had deserted her husband at the petitioner's solicitation. The court assumed both parties to have known that the cohabitation then begun was illicit. In 1905, when the death of the defendant's first husband became known to the couple, the petitioner declared to the defendant that "she was his wife"; and thereafter the two by habit, conduct and declarations continued to hold themselves out as husband and wife, until in 1916 the petitioner began suit for the annulment of the marriage of 1902. *Held,* that the petitioner was not entitled to relief, as the parties had since the removal of the impediment contracted a valid common law marriage. *Schaffer v. Krestovnikow* (1918, N. J. Ct. Err.) 105 Atl. 239.

The court approves *Collins v. Voorhees* (1890, Ct. Err.) 47 N. J. Eq. 555, 22 Atl. 1054, so far as that case holds that cohabitation known to the parties to have been illicit at the outset will be presumed *prima facie* to continue illicit. But the fruitlessly narrow rule of that case, that all subsequent cohabitation must be referred to the original invalid marriage *ceremony* unless a subsequent *marrying* is shown, may now be considered as definitely overruled. The position of the principal case that a common law marriage can under such circumstances be shown by a declaration of the man that the woman "was his wife," together